

EXHIBIT 14

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PLAZA PH2001 LLC,

Plaintiff,

-against-

PLAZA RESIDENTIAL OWNER LP, CPS 1 REALTY
LP, EL-AD PROPERTIES NY LLC, STRIBLING
MARKETING ASSOCIATES LLC and KRAMER
LEVIN NAFTALIS & FRANKEL LLP,

Defendants.

Index No. 602673/08
Plaintiff designate
New York County
as the place of trial

The basis of the venue is
Plaintiffs Place of Business:
c/o Kaye Scholer LLP
425 Park Avenue
New York, New York

**SUMMONS WITH
NOTICE**

County of New York

To the above named Defendants

You are hereby summoned to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded herein.

Dated, September 15, 2008

Notice: The nature of this action is damages for breach of contracts by defendants Plaza Residential Owner LP, CPS 1 Realty, and El-Ad Properties NY LLC; fraud perpetrated by the defendants Plaza Residential Owner LP and CPS 1 Realty LP and El-AD Properties NY LLC, and Stribling Marketing Associates LLC upon plaintiff; damages for negligent misrepresentation to plaintiff by defendant Plaza Residential Owner LP, CPS 1 Realty LP and EL-AD Properties NY LLC; deceptive trade practices by the defendants Stribling Marketing Associates and EL-AD Properties NY LLC; directing the defendant Kramer Levin Naftalis & Frankel LLP to return plaintiff's deposits it made under the sales agreement plaintiff entered into with defendant Plaza Residential Owner LP and CPS 1 Realty LP.

The relief sought by plaintiff is as follows:

(a) damages against the defendants Plaza Residential Owner LP and CPS 1 Realty LP for beach of contract in the sum of \$6,507,000 plus reasonable legal fees of not less than \$350,000 and appropriate interest; and

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(b) damages against the defendants Plaza Residential Owner LP, CPS 1 Realty LP, El-Ad Properties NY LLC, and Stribling Marketing Associates LLC jointly and severally for the fraud upon plaintiff in the sum of \$6,507,000; and

(c) damages in the sum of \$6,507,000 against the defendant Plaza Residential Owner LP, CPS 1 Realty LP, Stribling Marketing Associates LLC and El-Ad Properties NY LLC jointly and severally;

(d) damages against the defendants Plaza Residential Owner LP, CPS 1 Realty LP, Stribling Marketing Associates LLC and El-Ad Properties NY LLC jointly and severally for the deceptive trade practices in the sum of \$6,507,000; and

(e) a judgment against the defendant Kramer Levin Naftalis & Frankel LLP to pay the plaintiff \$6,507,000 of down payments made by plaintiff held in escrow by said defendant.

Upon your failure to appear, judgment will be taken against you by default as follows:

(a) against the defendants Plaza Residential Owner LP, CPS 1 Realty the sum of \$6,507,000 with legal fees of \$350,000 plus the appropriate interest from September 15, 2008 to date; and

(b) against the defendants Plaza Residential Owner LP, CPS 1 Realty LP, EL-AD Properties NY LLC, Stribling Marketing Associates LLC the sum of \$6,507,000 compensatory damages and \$3,500,000 punitive damages together with appropriate interest from September 15 to date; and

(c) against the defendant Kramer Levin Naftalis & Frankel LLP, directing that said defendants pay \$6,507,000 together with appropriate interest from September 5, 2008 to date.

Alter & Alter LLP
Attorneys for Plaintiff
300 East 42nd Street
New York, NY 10017

Defendant's Address:

Plaza Residential Owner LP
c/o El-Ad Properties NY LLC
575 Madison Avenue
New York, New York 10022
CPS 1 Realty LP
c/o El-Ad Properties NY LLC
575 Madison Avenue
New York, NY 10022

El-Ad Properties NY LLC
575 Madison Avenue
New York, NY 10022

Stribling Marketing Associates LLC
924 Madison Avenue
New York, NY 10021

Kramer Levin Naftalis & Frankel LLP
1177 Avenue of the Americas
New York, NY 10036

Index No.

Year 20

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PLAZA PH2001 LLC,

Plaintiff,

v.

PLAZA RESIDENTIAL OWNER LP, CPS I REALTY LP,
EL-AD PROPERTIES NY LLC, STRIBLING MARKETING
ASSOCIATES LLC AND KRAMER LEVIN NAFTALIS
& FRANKEL LLP,

Defendants.

SUMMONS WITH NOTICE

Attorneys for

ALTER & ALTER
Plaintiff

300 EAST 42 STREET
TENTH FLOOR
NEW YORK, N.Y. 10017
(212) 867-7777

Pursuant to 22 NYCRR 130-1.1-a, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, (1) the contentions contained in the annexed document are not frivolous and that (2) if the annexed document is an initiating pleading, (i) the matter was not obtained through illegal conduct, or that if it was, the attorney or other persons responsible for the illegal conduct are not participating in the matter or sharing in any fee earned therefrom and that (ii) if the matter involves potential claims for personal injury or wrongful death, the matter was not obtained in violation of 22 NYCRR 1200.41-a.

Dated:

Signature

Print Signer's Name

Service of a copy of the within

is hereby admitted.

Dated:

Attorney(s) for

PLEASE TAKE NOTICE

Check Applicable Box

☐ that the within is a (certified) true copy of a
NOTICE OF entered in the office of the clerk of the within-named Court on
ENTRY 20

☐ that an Order of which the within is a true copy will be presented for settlement to the
NOTICE OF Hon. , one of the judges of the within-named Court,
SETTLEMENT at
on 20 , at M.

Dated:

Attorneys for

ALTER & ALTER

To:

300 EAST 42 STREET
TENTH FLOOR
NEW YORK, N.Y. 10017

EXHIBIT 15

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
PLAZA RESIDENTIAL OWNER LP, CPS 1
REALTY LP, EL-AD PROPERTIES NY LLC,

Plaintiffs,

-against-

PENTHOUSE 2009, INC., PENTHOUSE 2011,
INC., and ANDREI VAVILOV,

Defendants.
-----X

Index No. 112706/08

NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE, that upon the accompanying affirmation of Stephen B. Meister, Esq., dated November 12, 2008 (the “Meister Aff.”), the accompanying Memorandum of Law, and all prior pleadings and proceedings heretofore had herein, plaintiffs Plaza Residential Owner LP, CPS 1 Realty LP and El-Ad Properties NY LLC (collectively, “Plaintiffs”) will cross-move in the Supreme Court of the State of New York, County of New York, Room 130, at the Courthouse located at 60 Centre Street, New York, New York, on December 4, 2008, at 9:30 a.m., or as soon thereafter as counsel can be heard, for an order (1) pursuant to CPLR 3211(d) granting Plaintiffs leave to take the deposition of defendant Andrey Vavilov and ordering defendants to respond to the Plaintiffs’ expedited jurisdictional discovery as requested in their discovery demands attached as Exhibit D to the Meister Aff., and (2) awarding Plaintiffs such other and further relief as the Court deems just and proper, including but not limited to, awarding Plaintiffs its costs and disbursements (including attorneys’ fees) incurred in this action.

PLEASE TAKE FURTHER NOTICE, that, pursuant to CPLR 2214(b), answering affidavits, if any, are required to be served upon the undersigned at least one (1) day before the return date of this motion.

Dated: New York, New York
November 12, 2008

MEISTER SEELIG & FEIN LLP

By: 

Stephen B. Meister
2 Grand Central Tower
140 East 45th Street, 19th Floor
New York, New York 10017
(212) 655-3500
Attorneys for Plaintiff

To: Morrison Cohen LLP
909 Third Avenue
New York, New York 10022
(212) 735-8600
Attorneys for Defendant Vavilov

Cahill Gordon & Reindel, LLP
80 Pine Street
New York, New York 10005
(212) 701-3000
Attorneys for Defendants

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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|---------------------------------------|---|
| -----X | |
| PLAZA RESIDENTIAL OWNER LP, CPS 1 | : |
| REALTY LP, EL-AD PROPERTIES NY LLC, | : |
| | : |
| Plaintiffs, | : |
| | : |
| -against- | : |
| | : |
| PENTHOUSE 2009, INC., PENTHOUSE 2011, | : |
| INC., and ANDREI VAVILOV, | : |
| | : |
| Defendants. | : |
| -----X | |

Index No. 112706/08

AFFIRMATION OF
STEPHEN B. MEISTER

STEPHEN B. MEISTER, an attorney duly admitted to practice before the Courts of the State of New York, affirms the following to be true under penalties of perjury:

1. I am an attorney and a member of Meister Seelig & Fein LLP, attorneys for Plaintiffs Plaza Residential Owner LP, CPS 1 Realty LP and El-Ad Properties NY LLC (collectively, "Plaintiffs").

2. I respectfully submit this affirmation in opposition to the motion brought defendants Penthouse 2009, Inc., Penthouse 2011, Inc. and Andrei Vavilov ("Defendants"), pursuant to CPLR Rule 3211(a)(1) and (7) and N.Y. Civil Rights Law § 74, seeking to dismiss Plaintiffs' complaint herein.

3. Attached hereto as **Exhibit A** is a true and correct copy of the Verified Complaint in this action.

4. Attached hereto as **Exhibit B** is a true and correct copy of the contract Defendants entered into to purchase Penthouse condominium Unit No. 2009 The Plaza.

5. Attached hereto as **Exhibit C** is a true and correct copy of the contract Defendants entered into to purchase Penthouse condominium Unit No. 2011 The Plaza.

6. Attached hereto as **Exhibit D** is a true and correct copy of a September 23, 2007 New York Times article "From Russia With Cash: Seeding a Hedge Fund."

Dated: New York, New York
November 12, 2008

A handwritten signature in black ink, appearing to be "SB Meister", written over a horizontal line.

STEPHEN B. MEISTER